

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARCO LORIMER DENIS,
[DOB: 1-9-1975]

Defendant.

No. 24-03099-01-CR-S-BCW

COUNT 1

18 U.S.C. §§ 922(g)(9) and 924(a)(2)
NMT 15 Years Imprisonment
NMT \$250,000 Fine
NMT 3 Years Supervised Release
Class C Felony

COUNT 2

18 U.S.C. §§ 922(a)(6) and 924(a)(2)
NMT 10 Years Imprisonment
NMT \$250,000 Fine
NMT 3 Years Supervised Release
Class C Felony

COUNT 3

18 U.S.C. §§ 922(a)(6) and 924(a)(2)
NMT 10 Years Imprisonment
NMT \$250,000 Fine
NMT 3 Years Supervised Release
Class C Felony

\$100 Special Assessment (Each Count of
Conviction)

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

On or between December 17, 2020, and July 16, 2024, in Greene County, in the Western District of Missouri, the defendant, **MARCO LORIMER DENIS**, did knowingly possess firearms, that is a (1) a Standard Manufacturing shotgun, bearing serial number DP04691; (2) a Maverick by Mossberg shotgun, bearing serial number MV14929L; (3) a Ruger pistol, bearing serial number 36450684; (4) a Smith & Wesson pistol, bearing serial number PBR4832; (5) a

Canik pistol, bearing serial number 20BN16825; (6) a Sig Sauer pistol, bearing serial number 47A114229; (7) a Bersa pistol, bearing serial number F77954; and (8) a Charter Arms revolver, bearing serial number 1411828, knowing that he had been convicted of a misdemeanor crime of domestic violence, to wit: domestic assault in the third degree in the Circuit Court of Greene County, Missouri, committed against a person with whom the defendant shared a child in common, all in violation of Title 18, United States Code Sections 922(g)(9) and 924(a)(2).

COUNT 2

On or about December 10, 2020, in Greene County, in the Western District of Missouri, the defendant, **MARCO LORIMER DENIS**, in connection with the acquisition of a firearm, that is a Canik pistol, bearing serial number 20BN16825, from Anchor Tactical Supply, Inc., a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement, to Anchor Tactical Supply, Inc., which statement was intended and likely to deceive Anchor Tactical Supply, Inc., as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, to the effect that he had not ever been convicted in any court of a misdemeanor crime of domestic violence, when in fact as the defendant then knew, he had been convicted of a misdemeanor crime of domestic violence, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 3

On or about January 14, 2021, in Greene County, in the Western District of Missouri, the defendant, **MARCO LORIMER DENIS**, in connection with the acquisition of a firearm, that is a a Sig Sauer pistol, bearing serial number 47A114229, from Anchor Tactical Supply, Inc., a

licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement, to Anchor Tactical Supply, Inc., which statement was intended and likely to deceive Anchor Tactical Supply, Inc., as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, to the effect that he had not ever been convicted in any court of a misdemeanor crime of domestic violence, when in fact as the defendant then knew, he had been convicted of a misdemeanor crime of domestic violence, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

A TRUE BILL.

/s/ Pamela Foster

FOREPERSON OF THE GRAND JURY

/s/ Stephanie Wan

STEPHANIE L. WAN

Assistant United States Attorney

Missouri Bar #58918

Dated: 8/28/2024

Springfield, Missouri